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 Attorney for Defendant, Strategic Venue Partners, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ANS ELECTRIC, LLC, a Nevada Limited)	Case No: 2:24-cv-00058-GMN-BNW
Liability company,)	
)	
Plaintiff,)	UNOPPOSED MOTION TO
)	EXTEND TIME TO RESPOND TO
)	COMPLAINT
vs.)	
)	(FIRST REQUEST)
STRATEGIC VENUE PARTNERS,)	
LLC, A Connecticut limited liability)	
company,)	
)	
Defendants.)	
)	

Pursuant to Federal Rule of Civil Procedure 6(b) and LR IA 6-1, Defendant Strategic Venue Partners, LLC (“SVP” or “Defendant”), by and through its counsel, respectfully moves the Court for its first extension of time, from February 1, 2024, to February 15, 2024, to file its answer, motion, or first responsive pleading to Plaintiff’s Complaint (ECF No. 1, the “Complaint”). In support thereof, Defendant states as follows:

1. On January 8, 2024, Plaintiff filed the Complaint in this Action alleging that Defendant had failed to pay an invoice totaling \$1,219,184.59. ECF No. 1, ¶ 25.
2. On January 11, 2024, such Complaint was served on Defendant.
3. While Defendant disputes that the invoice was due and payable, the invoice that forms the basis of the Complaint has now been paid.

1 4. As Defendant's deadline to file its answer, motion, or first responsive
2 pleading to Plaintiff's Complaint is February 1, 2024, Defendant seeks a two-week
3 extension of that deadline to allow the parties to discuss withdrawal of the suit given
4 that the invoice at issue is now paid and to allow Defendant time to prepare its response
5 to the Complaint. Defendant respectfully submits that this additional time to discuss
6 resolution or prepare its response constitutes good cause within the meaning of Fed. R.
7 Civ. P. 6(b)(1)(A) and LR IA 6-1.

8 5. Plaintiff does not oppose this extension request.

9 **CONCLUSION**

10 Defendant respectfully thanks the Court for considering its Motion.

11 Respectfully submitted,

12 FISHER & PHILLIPS, LLP

13
14 By: /s/ Scott M. Mahoney, Esq.
15 SCOTT M. MAHONEY, ESQ.
16 300 South Fourth Street
17 Suite 1500
18 Las Vegas, Nevada 89101
19 Attorneys for Defendant

20 IT IS SO ORDERED:

21 
22 UNITED STATES DISTRICT JUDGE

23 Dated: 1/31/2024

CERTIFICATE OF ELECTRONIC SERVICE

This is to certify that on the 30th day of January 2024, the undersigned, an employee of Fisher & Phillips LLP, electronically filed the foregoing **Unopposed Motion to Extend Time to Respond to Complaint (First Request)** with the United States District Court and a copy was electronically transmitted from the court to the e-mail address on file for:

Chad F. Clement, Esq.
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Jared M. Moser, Esq.
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By: /s/ Darhyl Kerr
An employee of Fisher & Phillips LLP

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